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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WOODLAWN FOUNDATION,
Plaintiff,
v.
UNITED STATES OF AMERICA,
Defendant.

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Case No. 06-3113-CRB

**PARTIES' THIRD STIPULATED
REQUEST TO EXTEND
DEADLINE TO REOPEN CASE
AND [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED AND RESPECTFULLY

19 REQUESTED by and between the parties to this action, as reflected by the signatures of their
20 respective counsel as set forth below, that the deadline to re-open this case should be extended for
21 an additional ninety-one (91) days, from April 1, 2008 to July 1, 2008.

22 1. The parties have outlined the lengthy settlement process in their Second Stipulated
23 Request to Extend the Deadline to Reopen Case.

24 2. The settlement proposal was submitted to the Department of Justice, Tax Division, on
25 March 3, 2008. Because of the dollar amount at issue in this case, a second level of review by the
26 Office of Review is necessary.

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3. The United States anticipates that all governmental review and IRS approval, if necessary, can be completed by July 1, 2008.

Respectfully submitted,

CARR, McClellan, INGERSOLL,
THOMPSON & HORN

Dated: March 6, 2008

/s/ Lage Andersen

LAGE ANDERSEN
Attorney for Plaintiff

JOSEPH RUSSONIELLO
United States Attorney

Dated: March 6, 2008

By: /s/ *Cynthia Stier*

CYNTHIA STIER

Assistant United States Attorney
Attorneys for the United States of America

ORDER

Pursuant to the Stipulation of the parties as set forth above, and for good cause shown,

IT IS HEREBY ORDERED that the deadline to reopen this case is extended from

April 1, 2008, to July 1, 2008.

Dated: March 7, 2008

